

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
MADELINE RIVERA BRUNO

DEBTOR(S)

CASE NO. 14-02328 (MCF)

CHAPTER 13

MOTION TO OBJECT CONFIRMATION OF PAYMENT PLAN

Comes now secured creditor, BANCO POPULAR DE PUERTO RICO, through the undersigned counsel and respectfully alleges and prays as follows:

1. BANCO POPULAR DE PUERTO RICO is a secured creditor having a duly executed and registered mortgage loan.
2. Creditor has filed a secured proof of claim for \$79,667.60, which includes \$1,191.83 in pre petition arrears.
3. Debtor's Payment Plan, dated March 26, 2014, fails to propose any payment of the arrears owed to BANCO POPULAR DE PUERTO RICO. It only states that debtor will maintain regular payments directly to creditor.
4. The proposed Plan should not be confirmed because the debtor does not contemplate the payment of the pre petition arrears owed to BANCO POPULAR DE PUERTO RICO, amounting to \$1,191.83.

WHEREFORE, BANCO POPULAR DE PUERTO RICO respectfully requests that this Honorable Court deny the confirmation of the Plan and issue such orders as may be just and proper.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 2nd day of May 2014.

CERTIFICATE OF SERVICE

I hereby certify that on the same date above I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee Jose R. Carrion Morales (newecfmail@ch13-pr.com), and debtor's attorney Roberto Figueroa-Carrasquillo (cmecf@rfclawpr.com). I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: Madeline Rivera Bruno, at HC 01 Box 25442, Caguas, PR 00725.

/s/ Juan C. Fortuño Fas
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